

Marquis Aurbach Coffing

Cody S. Mounteer, Esq.
Nevada Bar No. 11220
Chad F. Clement, Esq.
Nevada Bar No. 12192
Jared M. Moser, Esq.
Nevada Bar No. 13003
Collin M. Jayne, Esq.
Nevada Bar No. 13899
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
cmounteer@maclaw.com
cclement@maclaw.com
jmoser@maclaw.com
cjayne@maclaw.com

Law Offices of Philip A. Kantor, P.C.

Philip A. Kantor, Esq.
Nevada Bar No. 6701
1781 Village Center Circle, Suite 120
Las Vegas, Nevada 89134
Telephone: (702) 255-1300
Facsimile: (702) 256-6331
prsak@aya.yale.edu

*Attorneys for Interior Electric Incorporated
Nevada and Interior Electric Incorporated*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INTERIOR ELECTRIC INCORPORATED
NEVADA, a domestic corporation,

Plaintiff,

vs.

T.W.C. CONSTRUCTION, INC., a Nevada
corporation; TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA, a
Connecticut corporation; MATTHEW RYBA, an
individual; MARK WILMER, an individual;
GUSTAVO BAQUERIZO, an individual;
CLIFFORD ANDERSON, an individual;
POWER UP ELECTRIC COMPANY, a Nevada
corporation, dba POWER ON ELECTRIC

Case Number: 2-18-cv-01118-JAD-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
INTERIOR ELECTRIC
INCORPORATED NEVADA TO FILE ITS
RESPONSE TO THE TWC
DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S SECOND AMENDED
COMPLAINT [ECF NO. 191]**

(FIRST REQUEST)

COMPANY; BAMM ELECTRIC LLC, a Nevada limited liability company; PROLOGIS, L.P., a Delaware limited partnership; PHILCOR T.V. & ELECTRONIC LEASING, INC., a Nevada corporation, dba NEDCO; QED, INC., a Nevada corporation; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,

Defendants.

T.W.C. CONSTRUCTION, INC., a Nevada corporation,

Counterclaimant,

vs.

INTERIOR ELECTRIC INCORPORATED NEVADA, a domestic corporation; INTERIOR ELECTRIC, INC., a California corporation; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,

Counterdefendants.

Plaintiff Interior Electric Incorporated Nevada ("Interior Electric"), by and through its counsel of record, the law firms of Marquis Aurbach Coffing and the Law Offices of Philip A. Kantor, P.C., together with defendant and counterclaimant, T.W.C. Construction, Inc. ("TWC"), defendant Matthew Ryba, defendant Mark Wilmer, and defendant Travelers Casualty and Surety Company of America (collectively, "the TWC Defendants"), through their counsel of record, Greene Infuso, LLP, respectfully submit the following Stipulation and Order for Extension of Time for Plaintiff Interior Electric Incorporated to File its Response to the TWC Defendants' Motion to Dismiss Second Amended Complaint [ECF No. 191]. The parties hereby stipulate and agree as follows:

WHEREAS, the TWC Defendants filed their Motion to Dismiss Second Amended Complaint [ECF No. 191] on March 16, 2020;

WHEREAS, Interior Electric's deadline to file a response to the Motion to Dismiss Second Amended Complaint is currently March 30, 2020;

1 WHEREAS, due to the circumstances and complications from the COVID-19 pandemic,
2 Interior Electric has requested additional time to file a response to the Motion to Dismiss Second
3 Amended Complaint;

4 WHEREAS, the TWC Defendants have agreed to give Interior Electric up through and
5 including April 6, 2020, by which to file a response to the Motion to Dismiss Second Amended
6 Complaint;

7 WHEREAS, there are no other deadlines that are affected by this stipulation and proposed
8 order that are presently known to the parties; and

9 WHEREAS, this stipulation is entered into in good faith and not for any improper purpose
10 or to delay.

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 THEREFORE, Interior Electric and the TWC Defendants hereby stipulate and agree that
2 Interior Electric be allowed up through and including April 6, 2020, by which to file a response to
3 the Motion to Dismiss Second Amended Complaint.

4 **IT IS SO STIPULATED.**

5 Dated this 27th day of March, 2020.

 Dated this 27th day of March, 2020.

6 MARQUIS AURBACH COFFING

 GREENE INFUSO, LLP

7 /s/ Collin M. Jayne
8 By: Cody S. Munteer, Esq.
 Nevada Bar No. 11220
9 Chad F. Clement, Esq.
 Nevada Bar No. 12192
10 Jared M. Moser, Esq.
 Nevada Bar No. 13003
11 10001 Park Run Drive
 Las Vegas, Nevada 89145
12 cmunteer@maclaw.com
 cclement@maclaw.com
13 jmoser@maclaw.com

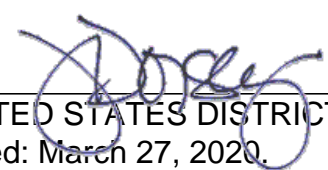
/s/ Michael V. Infuso
By: Michael V. Infuso, Esq.
 Nevada Bar No. 7388
 Keith Barlow, Esq.
 Nevada Bar No. 12689
 Sean Kirby, Esq.
 Nevada Bar No. 14224
 3030 S. Jones Blvd., #101
 Las Vegas, NV 89146
 minfuso@greeneinfusolaw.com
 kbarlow@greeneinfusolaw.com
 skirby@greeneinfusolaw.com
 Attorneys for TWC, Matthew Ryba,
 Mark Wilmer, and Travelers Casualty
 and Surety Company of America

14 LAW OFFICES OF PHILIP A. KANTOR, P.C.

15 Philip A. Kantor, Esq.
16 Nevada Bar No. 6701
17 1781 Village Center Circle, Suite 120
18 Las Vegas, Nevada 89134
 prsak@aya.yale.edu

19 *Attorneys for Interior Electric Incorporated*
20 *Nevada and Interior Electric Incorporated*

21
22 IT IS SO ORDERED:

23
24 
25 _____
26 UNITED STATES DISTRICT JUDGE
27 Dated: March 27, 2020.